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6  
7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

9  
10 Cyrus Hazari,

11 Plaintiff,

12 v.

13 Superior Court of Santa Clara County State of  
California, et al. and DOES 1-100,

14 Defendants.

Case No. 21-CV-04262 JSW

**DEFENDANT MANDY BRADY'S REPLY  
TO PLAINTIFF'S OBJECTIONS TO  
ORDER TO SHOW CAUSE WHY  
PLAINTIFF'S MEDICAL DOCUMENTS  
SHOULD BE MAINTAINED UNDER  
SEAL**

15 Judge: Hon. Jeffrey S. White

16  
17 On September 27, 2021, this Court ordered Plaintiff Cyrus Hazari ("Hazari") to show  
18 cause, no later than October 12, 2021, why he should not be required to serve his motions to seal  
19 and the accompanying documents on Ms. Brady. *Dkt* 38.

20 Hazari filed his "Objections" to the Order to Show Cause on October 12, 2021 (*dkt* 39),  
21 followed by an "Errata" and "missing" exhibits. *Dkt*. 40. While Hazari demonstrates great vigor  
22 and energy in assembling and drafting hundreds of pages of personal attacks on Ms. Brady, her  
23 counsel, and the California judiciary, the Objections and supporting exhibits never set forth any  
24 legal authority to support his contention that he is not required to comply with the rules for service  
25 set forth by the Federal Rules of Civil Procedure and this Court's Civil Local Rules. *See* Fed. R.  
26 Civ. P. 5(a); N.D. Civ. L.R. 5- 5, 7-11(a), and 79-5(d)(1). Furthermore, Hazari has failed to  
27 provide authority indicating that privileges can protect the materials at issue in light of authority  
28 cited previously (*see dkt* 37, 5:17-6:3) and the allegations of his own pleading.

Furthermore, this Court should be aware that since the entry of its stay of this matter, Hazari has vigorously filed and pursued claims in State court, including as follows:

- On September 15, 2021, Hazari filed a “Declaration About The Continued Improprieties And Hate Crimes Of The Appeal Court Of The 6<sup>th</sup> District And The Superior Court Of Santa Clara County” in California Court of Appeal (Sixth District) Case No. H049414. This consisted of 151 pages of argument and exhibits that on information and belief were drafted and assembled by Hazari.
- On October 1, 2021, Hazari filed a “Writ to Further Document The Improprieties Of A Corrupt Judge, Socrates Manoukian, And His Scheme To Undermine Justice In Collusion With This Court And To Ensure That Disability Hate Crimes Pay Dividends For Himself And His Fellow Judges” in *Hazari v. Brady*, Santa Clara County Superior Court Case No. 16CV295730. Hazari’s filing consisted of 135 pages of argument and exhibits that on information and belief were drafted and assembled by Hazari.
- On October 20, 2021, Hazari filed a Notice of Appeal in *Hazari v. Brady*, Santa Clara County Superior Court Case No. 16CV295730.

Accordingly, this Court should find that Hazari has failed to show cause why his medical records should remain under seal, and Order Hazari to immediately serve his motions to seal and the accompanying documents on Ms. Brady, and further Order that the failure to do so will be grounds for sanctions.

Dated: October 27, 2021

MESSNER REEVES LLP

By:   
 JULIAN PARDO DE ZELA  
 Attorneys for Defendant MANDY BRADY

**PROOF OF SERVICE**

**Hazari v. Superior Court, et al.**  
**Case No. 21-cv-04262 JSW**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Santa Clara, State of California. My business address is 160 W. Santa Clara Street, Suite 1000, San Jose, CA 95113.

On October 27, 2021, I served true copies of the following document(s) described as  
**DEFENDANT MANDY BRADY'S REPLY TO PLAINTIFF'S OBJECTIONS TO ORDER  
TO SHOW CAUSE WHY PLAINTIFF'S MEDICAL DOCUMENTS SHOULD BE  
MAINTAINED UNDER SEAL** on the interested parties in this action as follows:

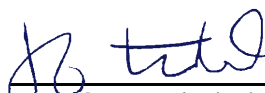
Cyrus Hazari  
15209 Blue Gum Court  
Saratoga, CA 95070  
Telephone/Fax: (408) 766-7471  
Email: [cyrus@metafusion.net](mailto:cyrus@metafusion.net)

Plaintiff In Pro Per

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Messner Reeves LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at San Jose, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 27, 2021, at San Jose, California.

  
Jennifer K. Timbol